# U.S. Department of Energy Naval Reactors Representative's Office Kesselring Site

National Environmental Policy Act (NEPA) Categorical Exclusion (CX)

Determination Summary Form

OVERHEAD PIPING MAJOR CONSTRUCTION PROJECT (MCP)

### REFERENCE

10 CFR Part 1021, Department of Energy National Environmental Policy Act Implementing Procedures, Subpart D, Typical Classes of Actions

#### PROJECT SCOPE DISCUSSION

The scope of the Kesselring Site (KS) Overhead Piping Project includes the replacement and/or modification of aged overhead utility piping and the piping's structural support network at KS. The piping is used to convey steam, steam condensate, compressed air and demineralized water in support of Site operations.

The project does not violate applicable regulatory requirements, require construction or major expansion of waste handling facilities, result in unpermitted releases of hazardous substances, or adversely affect environmentally sensitive resources, including wetlands. The project does not involve genetically engineered organisms or species. There are no extraordinary circumstances related to the proposed action. The project has not been segmented to meet the definition of a categorical exclusion and is not connected to other actions with potentially significant and/or cumulative impacts.

#### CONCLUSION

The KS Overhead Piping MCP is categorically excluded from additional National Environmental Policy Act (NEPA) documentation under 10 CFR 1021 Subpart D, Appendix B, B1.3, B1.15, B1.27, B5.2, and B5.4. Specifically, the categorical exclusion that applies is:

#### B1.3 Routine Maintenance

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventative, and predictive, are required to maintain and preserve

buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornados), wildfires, and other such events. Routine maintenance may result in replacement to the extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;
- (b) Door and window repair or replacement;
- (c) Wall, ceiling, or floor repair or replacement;
- (d) Reroofing;
- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;
- (f) Routine replacement of high-efficiency particulate air filters;
- (g) Inspection and/or treatment of currently installed utility poles;
- (h) Repair of road embankments;
- (i) Repair or replacement of fire protection sprinkler systems;
- Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);
- (I) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, cross-arms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and
- (p) Removal of debris.

# **B1.15 Support Buildings**

Siting, construction or modification, and operation of support buildings and support structures (including, but not limited to, trailers and prefabricated modular buildings) within or contiguous to an already developed area (where active utilities and currently used roads are readily

accessible). Covered support buildings and structures include, but are not limited to, those for office purposes; parking; cafeteria services; education and training; visitor reception; computer and data processing services; health services or recreation activities; routine maintenance activities; storage of supplies and equipment for administrative services and routine maintenance activities; security (such as security posts); fire protection; small-scale fabrication (such as machine shop activities), assembly, and testing of non-nuclear equipment or components; and similar support purposes, but exclude facilities for nuclear weapons activities and waste storage activities, such as activities covered in B1.10, B1.29, B1.35, B2.6, B6.2, B6.4, B6.5, B6.6, and B6.10.

### **B1.27 Disconnection of Utilities**

Activities that are required for the disconnection of utility services (including, but not limited to, water, steam, telecommunications, and electrical power) after it has been determined that the continued operation of these systems is not needed for safety.

### B5.2 Modifications to Pumps and Piping

Modifications to existing pump and piping configurations (including, but not limited to, manifolds, metering systems, and other instrumentation on such configurations conveying materials such as air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, oil, produced water, steam, and water). Covered modifications would not have the potential to cause significant changes to design process flow rates or permitted air emissions.

## B5.4 Repair or Replacement of Pipelines

Repair, replacement, upgrading, rebuilding or minor relocation of pipelines within existing rights-of-way, provided that the actions are in accordance with applicable requirements (such as Army Corps of Engineers permits under section 404 of the Clean Water Act). Pipelines may convey materials including, but not limited to, air, brine, carbon dioxide, geothermal system fluids, hydrogen gas, natural gas, nitrogen gas, oil, produced water, steam, and water.

NRRO Approval:

S Miller

Date: 17 JAN I

CX Determination Date